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August 24, 2021

Via Email/ECFThe Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312Re: *Breeana George v. Riverside Park Conservancy*, Case No. 1:20-cv-09732-AT-KHP

Dear Judge Torres:

We represent Defendant Riverside Park Conservancy ("RPC") in connection with the above action. We write jointly with Plaintiff to request a stay of discovery and other proceedings in the matter until the parties' next scheduled settlement conference before Magistrate Judge Parker on September 22.

The parties have had two productive settlement conferences thus far, one on July 27 and one on August 20, with significant progress made towards settlement in each. The next scheduled settlement conference is September 22, the earliest available date on which Judge Parker and the parties could meet. The parties agree that it is prudent to conserve resources until the next settlement conference in order to avoid litigation costs distorting any potential resolution and maximize the likelihood that the parties are able to reach agreement on September 22.

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Fact discovery and depositions are currently set to close on October 10; this request would extend that to November 12. Expert discovery is currently set to close November 23; this request would extend that to December 26. We have requested one previous extension, which was granted by Your Honor on July 29. [Dkt. No. 30.]

We thank Your Honor for your consideration of this request.

Respectfully Submitted,

/s/ Andrew J. Ehrlich

Andrew J. Ehrlich

cc: Counsel of Record

GRANTED. The conference scheduled for October 5, 2021, is ADJOURNED to **November 30, 2021**, at **10:20 a.m.** By **November 23, 2021**, the parties shall submit their joint status letter.

SO ORDERED.

Dated: August 24, 2021
New York, New York



ANALISA TORRES
United States District Judge